

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

JOINT SUBMISSION REGARDING DISCOVERY HEARING ON APRIL 25, 2006

Plaintiff LG.Philips LCD Co., Ltd. (“LPL”) and Defendants Tatung Company, Tatung Company of America, Inc., Chunghwa Picture Tubes, Ltd., and ViewSonic Corporation (collectively, “Defendants”), respectfully file this Joint Submission regarding the discovery hearing scheduled for April 25, 2006, and state as follows:

At the March 1, 2006 discovery hearing, the Court ordered the parties to exchange certain discovery. The Court also ordered that a further hearing would be scheduled to address any alleged non-compliance with the Court’s March 1 rulings, which is now scheduled for April 25. In response to the Court’s rulings, the parties exchanged additional discovery. On March 31, 2006, the parties filed pre-hearing submissions regarding remaining discovery issues.

Counsel have met and conferred regarding the issues set forth in their March 31 submissions to the Court. The parties have resolved and narrowed additional discovery issues.¹ In light of their good faith efforts, the parties agree that no party should be held in contempt

¹ While narrowing the issues for the hearing, the parties reserve the right to address all appropriate issues in depositions and, if necessary and appropriate, to raise additional discovery issues in the future.

concerning the Court's discovery rulings. At the April 25 discovery hearing, the parties seek the Court's assistance and instruction regarding the few remaining unresolved issues.

THE BAYARD FIRM

RICHARDS, LAYTON & FINGER, P.A.

/s/ Richard D. Kirk (rk0922)
rkirk@bayardfirm.com
222 Delaware Avenue, Suite 900
Wilmington, DE 19899-5130
(302) 655-5000
Attorneys for Plaintiff
LG.Philips LCD Co., Ltd.

Robert W. Whetzel (rw2288)
whetzel@rlf.com
One Rodney Square, P.O. Box 551
Wilmington, DE 19899
(302) 651-7700
Attorneys for Defendants
Tatung Co., Tatung Co. of America, Inc.,
Chunghwa Picture Tubes, Ltd., and
ViewSonic Corp.

April 24, 2006